

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CARMEN PLASCENCIA)	CASE NO. 1:19-cv-02046
)	
Plaintiff,)	JUDGE JAMES S. GWIN
)	
vs.)	MAGISTRATE JUDGE DAVID A.
)	RUIZ
TAPATIAS FOOD LLC, D/B/A)	
TAPATIA'S TAQUERIA)	<u>PRELIMINARY ESTIMATE OF</u>
)	<u>ATTORNEYS' FEES AND COSTS</u>
Defendant.)	

Pursuant to the Court's Case Management Conference Scheduling Order, Plaintiff submits the following Preliminary Estimate of Attorneys' fees and costs:

INTRODUCTORY STATEMENT

The following attorneys' fees itemization is a preliminary estimate and/or budget of the amount of fees and expenses anticipated to be the subject of Plaintiff's claims. Plaintiff reserves the right to supplement this itemization.

ATTORNEYS' FEES ITEMIZATION

<u>Attorneys' fees</u>		<u>Expenses</u>	
Preliminary Investigation, Research, and Complaint:	\$5,000.00	Filing Fee:	\$400.00
Discovery:	\$15,000.00	Depositions:	\$10,000.00
Dispositive Motions Practice:	\$30,000.00	Experts:	n/a
Damage Calculations, Settlement Negotiations and Court Approval:	\$15,000.00	Witness Fees:	\$1,000.00
		Other:	\$4,000.00
		Total Expenses:	\$15,400.00
Trial:	\$60,000.00		
Total Fees:	\$125,000.00		

Respectfully submitted,

/s/ Lori M. Griffin
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2020, a copy of the foregoing *Plaintiff's Preliminary Estimate of Attorneys' Fees and Costs* was sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's system.

/s/ Lori M. Griffin
One of the Attorneys for Plaintiffs